

L. Poe Leggette (Wyoming Bar No. 7-4652)  
Mark S. Barron  
Alexander K. Obrecht (Wyoming Bar No. 7-5542)  
BAKER & HOSTETLER LLP  
1801 California Street, Suite 4400  
Denver, Colorado 80202  
Telephone: 303.861.0600  
Facsimile: 303.861.7805  
pleggette@bakerlaw.com  
mbarron@bakerlaw.com  
aobrecht@bakerlaw.com

*Attorneys for Petitioner Western Energy Alliance*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

WESTERN ENERGY ALLIANCE and )  
PETROLEUM ASSOCIATION OF )  
WYOMING, )

Petitioners, )

v. )

Civil Case No. 0:21-cv-00013-SWS

JOSEPH R. BIDEN, Jr., in his official )  
capacity as President of the United States, )  
DEB HAALAND, in her official )  
capacity as Secretary of the Interior, )  
and UNITED STATES BUREAU )  
OF LAND MANAGEMENT, )

Respondents. )

**SECOND AMENDED PETITION FOR REVIEW OF GOVERNMENT ACTION**

Petitioners Western Energy Alliance and the Petroleum Association of Wyoming submit respectfully this petition for review of government action under Local Civil Rule 83.6. On January 27, 2021, the President of the United States directed the Secretary of the Interior to suspend indefinitely the federal oil and gas leasing program. On or about February 12, 2021, the

Secretary added notations on the Bureau of Land Management's website indicating that all onshore oil and gas lease sales scheduled for March or April 2021 have been postponed. The suspension of the leasing program is an unsupported and unnecessary action that is inconsistent with the Secretary's statutory obligations. Because the suspension is both arbitrary and capricious and contrary to law, the Court should find the suspension invalid and set aside the challenged government action.

This Court has federal-question jurisdiction under 28 U.S.C. § 1331. Respondent President Biden is an officer of the United States; Respondent Haaland is an officer of the United States; the Bureau of Land Management is an entity of the United States Government. The United States has waived its sovereign immunity under the APA, 5 U.S.C. § 702.

Submitted respectfully this 17th day of March, 2021,

/s/ L. Poe Leggette

L. Poe Leggette

Mark S. Barron

Alexander K. Obrecht

BAKER & HOSTETLER LLP.

1801 California Street, Suite 4400

Denver, Colorado 80202

Telephone: 303.801.2700

Facsimile: 303.801.2777

Telephone: 303.861.0600

Facsimile: 303.861.7805

pleggette@bakerlaw.com

mbarron@bakerlaw.com

aobrecht@bakerlaw.com

*Attorneys for Western Energy Alliance*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 17, 2021, a copy of the foregoing **SECOND AMENDED PETITION FOR REVIEW OF GOVERNMENT ACTION** was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

A true and correct copy was also served by electronic mail on the following party:

Mr. Michael Sawyer, Esq.  
Trial Attorney, Natural Resources Section  
Environment & Natural Resources Division  
United States Department of Justice  
michael.sawyer@usdoj.gov

/s/ L. Poe Leggette

L. Poe Leggette